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Attorneys for Plaintiff Lee C. Kamimura
individually and on behalf of others similarly situated

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Lee C. Kamimura, *individually*
and on behalf of all others
similarly situated,

Plaintiff,

v.

Ditech Financial LLC, fka Green
Tree Services LLC,

Defendant.

Case No.: 2:16-cv-00783-APG-CWH

**Joint Stipulation and Order to
Extend the deadline to file
dispositive motions and Plaintiff's
motion for class certification**

(Sixth Request)

1 Plaintiff Lee C. Kamimura (“Plaintiff”) and Defendant Ditech Financial LLC,
2 fka Green Tree Services LLC (“Defendant” and together with Plaintiff, the
3 “Parties”) by and through their counsel of record hereby stipulate to extend the
4 motions deadline in this case as follows:

5 (1) The deadline for Plaintiff to file his motion for class certification will be
6 March 7, 2018.

7 (2) The deadline to file dispositive motions will be April 9, 2018.

8 The current deadline to file dispositive motions is February 28, 2018. ECF
9 No. 44. Since this Court’s October 3, 2017 scheduling order, ECF No. 44, this
10 Court granted two additional stipulations by the parties to extend the discovery
11 cutoff. ECF Nos. 46, 48.

12 Good cause exists to amend the Scheduling Order. The parties took each
13 others’ experts depositions on February 8-9, 2018. The parties are still waiting for
14 deposition transcripts to become available. Discovery is closed and the Parties do
15 not seek any additional discovery, other than the discovery dispute raised in
16 Plaintiff’s motion to compel discovery. ECF No. 29.

17 The Parties are also continuing to actively discuss an informal resolution to
18 this matter.

19 Pursuant to LR 26-4(a), the Parties have propounded written discovery
20 requests on each other, have taken each others’ depositions and expert depositions.

21 Pursuant to LR 26-4(b), the Parties request additional time to receive, read
22 and sign, expert deposition transcripts and file dispositive motions in this case and
23 for Plaintiff to file his class certification motion.

24 Plaintiff anticipates filing his motion for class certification and a motion for
25 summary judgment on or before March 7, 2018. The parties request a 45-day
26 extension to file their dispositive motions.

27 Pursuant to LR 26-4(d), the Parties respectfully propose the following
28 briefing schedule:

1 (1) The deadline for Plaintiff to file his motion for class certification will be
2 **March 7, 2018.**

3 (2) The deadline to file dispositive motions will be **April 9, 2018.**

4 This is the Parties' sixth request for an extension of these deadlines.

5 DATED this 22nd day of February 2018.

6 **KAZEROUNI LAW GROUP, APC**

7 By: /s/ Michael Kind
8 Michael Kind, Esq.
9 6069 South Fort Apache Road, Suite 100
10 Las Vegas, Nevada 89148
11 *Attorneys for Plaintiff*

12 **SEVERSON & WERSON**

13 By: /s/ Mary Kate Kamka
14 Donald H. Cram, Esq.
15 Laszlo Ladi, Esq.
16 Mary Kate Kamka, Esq.
17 One Embarcadero Center, Suite 2600
18 San Francisco, California 94111
19 *Attorneys for Defendant Ditech Financial LLC*
20 *formerly known as Green Tree Servicing LLC*

21 **ORDER**

22 IT IS HEREBY ORDERED that:

23 (1) The deadline for Plaintiff to file his motion for class certification will be
24 March 7, 2018, and

25 (2) The deadline to file dispositive motions will be April 9, 2018.

26 IT IS SO ORDERED.

27 
28 UNITED STATES MAGISTRATE JUDGE

Dated: February 27, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on February 22, 2018, the foregoing Stipulation was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

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